

EXHIBIT 6

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IN THE HIGH COURT OF JUSTICE
COMMERCIAL DIVISION (1)
ACCRA – A.D. 2019

SUIT NO. CM/RPC/0641/18

FORTUNE GLOBAL SHIPPING & LOGISTICS LTD -----
15 FATAI IRAWO STREET
AJAWO ESTATE, LAGOS STATE, NIGERIA

PLAINTIFF/RESP

VRS

1. THE VESSEL DLB SEA HORIZON ----- 1ST DEF/APPLICANT

2. THE MASTER OF THE VESSEL DLB SEA HORIZON - DEFENDANTS

3. THE OWNERS OF THE VESSEL DLB SEA HORIZON ----- 25-1-19

4. CONSOLIDATED SHIPPING AGENCIES
(CONSHIP) (AGENTS) ----- 11-1-19
PLOT NOS. 21/22 COMMERCIAL WATERHOUSE
AREA, P. O. BOX CT 2491, ACCRA – GHANA -----
Registrar

COMMERCIAL DIVISION OF THE
HIGH COURT, ACCRA

5. RANGER SUBSEA NIGERIA LTD
D93 LANDBRIDGE AVENUE, ONIRU ESTATE
VICTORIA ISLAND, LAGOS STATE, NIGERIA

6. SUNTX CAPITAL
TWO-LINCOLN CENTRE SUITE 1000
5420 LBJ FREEWAY
DALLAS TEXAS 7520, USA

7. RANGER OFFSHORE USA INC
10370 RICHMOND AVENUE,
SUITE 1000, HOUSTON TEXAS 77042, USA

8. RANGER INTERNATIONAL LTD
10370 RICHMOND AVENUE,
SUITE 1000, HOUSTON TEXAS 77042, USA

9. TECHNIXS OIL FIELD SUPPORT LTD
TECHNIXS BASE BESIDE NBTC,
OVWIAN OFF WARRI ALADJA EXPRESSWAY,
OVWIAN WARRI, DELTA STATE, NIGERIA

10. WAG SPV 1
5420 LBJ FREEWAY 1000,
DALLAS, TEXAS, USA

11. RANGER INTERNATIONAL LIMITED
AJELTAKE ROAD, AJELTAKE ISLANDS
COMPANY COMPLEX, MARSHALL ISLANDS

**MOTION ON NOTICE FOR SECURITY FOR COSTS
ORDER 24 RULE 1**

MOTION ON NOTICE by Counsel for and on behalf of the 1st Defendant/Applicant praying this Honourable Court to order the Plaintiff/Respondent to provide security for costs as per the accompanying affidavit in support and for any further or other orders as to this Honourable Court may seem fit.

Court to be moved on WED the 6th day of FEB 2019 at 9.00 O'clock in the forenoon or soon thereafter as Counsel may be heard.

DATED AT D. K. AMELEY & ASSOCIATES, SUITE A1, 3RD FLOOR, TDC TOWERS, COMM. 2, TEMA, THIS 24TH DAY OF JANUARY, 2019.

D.K. AMELEY & ASSOCIATES
SUITE A1 3RD FLOOR
TDC TOWERS
COMMUNITY 2, TEMA

SOLICITOR FOR 1ST DEFENDANT/APPLICANT

The Registrar
High Court
Commercial Division
Accra

And To:

1. The Plaintiff or its Solicitor, Dr. Kofi Mbliah (Esq.), Alliance Partners, SSNIT Pension House, Tower Block (2nd & 4th Floor), Accra.
2. The 4th Defendant or their Solicitor, Esine Okudzeto Esq. Sam Okudzeto & Associates, Sena Chambers, 1st Floor, Total House, Liberia Road, Accra.

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25-1-19
11:15
Registrar
COMMERCIAL DIVISION OF THE
HIGH COURT, ACCRA

AFFIDAVIT IN SUPPORT

I, **Daniel Kofi Ameley**, Solicitor of Messrs D.K Ameley & Associates and of Suite A1 3rd Floor, TDC Towers, Community 2, Tema, make oath and say as follows: -


1. That I am the Deponent herein.
2. That I am a Solicitor of Messrs. D. K. Ameley & Associates, and I have the authority of the 1st Defendant/Applicant vessel, to depose to this affidavit in support of matters within my personal knowledge.
3. That the Plaintiff/Respondent issued a Writ of Summons against the 1st Defendant herein among others seeking reliefs as endorsed on the writ of summons and at the hearing of this application leave will be sought of this Honourable Court to refer to all processes so far filed in this suit.
4. That the 1st Defendant/Applicant among other Defendants have filed a Statement of Defence to the claim in essence denying in its entirety the claim made against the vessel.
5. That further to the issuing of the writ of summons, the Plaintiff/Respondent applied for the 1st Defendant vessel to be arrested and detained until the 1st Defendant provides security in the sum of four million US Dollars (US\$4,000,000.00) for its release.
6. That by the said arrest, the 1st Defendant/Applicant is losing about four million US Dollars (US\$4,000,000.00), among others, for loss of business.
6. That the Plaintiff/Respondent indicates by the Statement of Claim that it is a company registered in the Federal Republic of Nigeria and has its address as 15 FATAI IRAWO STREET, AFAWO EESTATE, LAGOS STATE, NIGERIA.
7. That the Plaintiff/Respondent is therefore not Ghanaian resident and indeed operates in Nigeria, outside the jurisdiction of this Honourable Court.
8. That I therefore apply that this Honourable Court orders the Plaintiff to pay 10% of the amount to be provided as security for costs, so that in the likely event of the Plaintiff losing the action, and costs are awarded, the 1st Defendant will be able to enforce the costs against the Plaintiff.

WHEREFORE I depose to this Affidavit in Support.

Sworn to at *Accra* this *25*
Day of *Jan* 2019)


DEPONENT

Before me)


COMMISSIONER FOR OATHS
JOHN AHETOU